

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

EMIGRA GROUP, LLC,

Plaintiff,

--against--

FRAGOMEN, DEL REY, BERNSEN & LOEWY, LLP,
FRAGOMEN, DEL REY, BERNSEN & LOEWY II, LLP,
FRAGOMEN GLOBAL IMMIGRATION SERVICES,
LLC, FRAGOMEN GLOBAL LLP, AND RYAN
MATTHEW FREEL,

Defendants.

STIPULATION

No. 07-cv-10688 (LAK) (HP)

ECF CASE

WHEREAS, Plaintiff Emigra Group, LLC ("Emigra") filed its initial Complaint in the above-captioned action through the Court's ECF system on November 29, 2007, but service of such Complaint has not yet been fully accomplished; and

WHEREAS, Emigra filed an Amended Complaint through the Court's ECF system on December 21, 2007, but service of such Amended Complaint has not yet been fully accomplished; and

WHEREAS, Defendants have received true copies of the Complaint and the Amended Complaint and related documents by informal means; and

WHEREAS, the parties wish to avoid the cost and effort required to complete formal service of process and to provide Defendants additional time to respond to Emigra's pleading, pursuant and subject to the terms and conditions recited herein; and so

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED THAT:

1. Defendants hereby acknowledge proper service of the Complaint and the Amended Complaint; and
2. Defendants hereby waive any objection they may otherwise have had to sufficiency of process and/or to sufficiency of service of process; and
3. Defendants will respond to the Amended Complaint on or before February 22, 2008; and
4. Defendants do not waive any defenses to any claims asserted in these actions by entering into this Stipulation, other than those expressly set forth in this Stipulation.

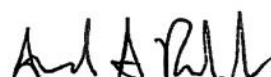
Dated: New York, New York
January 9, 2008

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Dated: January ____, 2008

SO ORDERED:

U.S.D.J.